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 Postal Regulatory Commission
 Office of the Chief Admin. Officer

POSTAL REGULATORY
 COMMISSION
 OFFICE OF THE SECRETARY

November 14, 2011

Appeal of Final Determination to Close the Spring Dale, WV Post Office and Extend Service by Highway Contract Route Service. Docket Number 1382525-25986.

My company, Alvarez Contractors, is a customer of the Spring Dale, Post Office (P.O. Box 81). Though many reasons to not interrupt service at this post office have been adequately and competently addressed by others, I wish to appeal the closure based on the following two reasons:

1. As I carefully and fully demonstrated in my letter during the proposal phase, the closure of this post office is harmful to all businesses in the area. The unrealistic replies received from the USPS by those of us who are self employed are nothing more than form letters. It remains an ignored but absolute fact that the nature of my business cannot be satisfied by having a mailbox on a carrier route.
 Packages are different weights and sizes, and they ship to varying zip codes. That makes it impossible for the mail carrier to handle them. I cannot afford to stand by the road waiting for the carrier when the carrier's arrival time will vary depending on many circumstances.
 The carrier cannot provide special services, including certified mail, delivery confirmation, return receipts, registered mail, etc. I often need to visit the Spring Dale post office to determine which mailers are suitable for my packages. I am very busy every day. I can make a trip to the Spring Dale in much less time than that required for a round trip to the Meadow Bridge post office.
2. As an estimator for Alvarez Contractors over a period of 27 years, I have encountered many estimates as to costs, payroll, maintenance, and other expenses that have been prepared with a bias or simply as a means to justify an end. I quickly see an absence of creditability and lack of itemization by USPS in regard to values the public is expected to accept as fact. Being disingenuous is a common ploy used to overwhelm or unduly influence defenseless people. We have previously brought this to the attention of the USPS in writing. We attempted to do so in a public meeting but were ignored. I list estimating issues as follows:
 - a) Windows Transaction Data: This information is recorded over a two week period, and then arbitrary constants are applied to calculate values that are to reinforce the pre-decided decision of USPS to close this office. The actual time the O.I.C. at this particular post office is busy is significantly underestimated.

- b) Declining Workload: This relates to "a" above and additionally suffers from the fact that the previous postmaster who retired in 2009 had built the revenue at this post office to a value much higher than it was several years ago. Therefore, the workload and sales increased, not decreased, in recent years.
- c) O.I.C. Salary: Contrary to the data presented in the USPS documents, the O.I.C. does not receive fringe benefits. We have asked that steps be taken to adjust this post office from a level 11 to an EP rating. For our post office this appears to be within limits related to PS-150 or other criteria.
- d) "Less" Cost of Replacement Services: The alleged annual \$3600 offset cost of a carrier has been minimized to suggest only a slight cost increase due to closure of the post office. An added expense of \$3600 per year reduces to \$300 per month or about \$15 per day. Those of us familiar with estimating, knowledge of the route, the additional number of mailboxes to be in use, and other circumstances, have no doubt that an alleged cost of approximately \$15 per day is nothing less than deception. Furthermore, an increase in mailboxes will, in this case, result in the carrier not being able to return to the Meadow Bridge post office in time to let outgoing mail be dispatched the same day.
- e) Annual Lease Costs: We have informed management for USPS verbally and by letter that most, if not all, of the lease expense (\$11,319 per year) can be stopped. In Spring Dale, there is an excellent building that formally was a post office. It is located on the main route and is less than ¼ mile from the existing post office. Serious consideration has been made to make this building available at very minimal expense to USPS.

A combination of the cost cutting measures we have offered may cure the deficient here or surely reduce it to an insignificant level.

It is the obligation and responsibility of the officers within USPS to be open-minded and cooperative. Openly ignoring suggestions and data from an entire community in a cold, clinical manner is arbitrary and capricious. The decision to close should therefore be remanded with a recommendation that the USPS dismiss this case in favor of the customers.

Sincerely,



Gary Walker, Vice President
Alvarez Contractors, Inc.